



**Workforce Innovation and Opportunity Act Title I-B Policy Manual**

**Chapter 2 - Section 400**

**Subject: Supportive Services**

## 400 Background and Purpose

Supportive services, such as transportation, child care, dependent care, housing, and needs-related payments are necessary to enable an individual to participate in activities authorized under the Workforce Innovation and Opportunity Act (WIOA) Title I-B Adult, Dislocated Worker, and Youth Programs, career or training services.

WIOA Title I-B requires the Local Workforce Development Boards (LWDBs) and Service Providers to provide accurate information about the availability of supportive services in the Local Workforce Development Areas (LWDAs), as well as to provide referrals to such activities as one of the career services for the WIOA Title I-B Adult and Dislocated Worker Programs. The WIOA Title I-B Youth Program also includes supportive services as one of the 14 program elements.

LWDBs may fund supportive services for participants of the WIOA Title I-B Adult, Dislocated Worker, and Youth Programs when the services are necessary to enable an individual, who cannot afford to pay for such services, to participate in WIOA Title I-B career or training services, when the supportive service is not available from other sources.

References: WIOA of 2014 ([Public Law 113-128](#)), [20 CFR § 680.900-970](#), [681.570](#), [A.R.S 41-1967](#), and Training and Employment Guidance Letter (TEGL) [19-16](#), [21-16](#), [09-22](#).

## 401 Supportive Services Provision

While LWDBs may define policy for supportive services deemed appropriate to maximize flexibility in the LWDA, supportive services are subject to the conditions prescribed by the WIOA Act, regulations, and this policy.

### .01 LWDB Supportive Service Policy Requirements

LWDBs must work with ARIZONA@WORK Job Center partners and other community partners to establish a policy on supportive services that ensures the highest quality, most comprehensive service provision that prevents the duplication of resources and services in the LWDA. LWDB policies and procedures must include, at a minimum:

- A. Eligibility criteria;
- B. Types of supportive services that will be offered;
- C. Procedures for referral to supportive services, including how services will be funded when they are not available from other sources;
- D. Procedures for authorizing supportive service requests; and
- E. Established limits, including a maximum amount of funding and maximum length of time for supportive services to be available, as well as procedures to grant exceptions to these limits.

## **.02 Supportive Service Requirements**

**Supportive Services** must be documented **and** appropriately recorded in the system **of record**. Supportive services must only be provided through WIOA Title I-B Programs when the individual is unable to obtain supportive services through other programs that provide such services.

**A.** Supportive services may only be provided to:

- 1. Adults and dislocated workers who are participating in career or training services and are determined to be in need; and
- 2. Youth who have been determined in need of such services.

**B.** The provision of supportive services must be necessary and reasonable.

- 1. To be necessary, there must be documentation of the need for the support service to provide and continue with WIOA career and training services.
- 2. To determine reasonableness, the product or service must be consistent with comparable market prices.
  - a. To determine comparable market prices, there must be a comparison of the product or service from at least two or more vendors.
  - b. Costs must be on par with comparable market prices for the service or commodity, both in cost and in the item being purchased, per [2 CFR Part 200.404](#). Fiscal Policy 100, Allowable Costs, must still be followed,

except for items with well-established prices (e.g., bus passes, gas cards, utility bills). The Allowable Costs Policy is located at the Arizona Department of Economic Security (ADES) [Title I-B Policy and Procedure Manual](#) webpage, under the tab listed as Fiscal Policies.

3. Payments for supportive services may be made directly to the vendor, or as a reimbursement to the participant.

C. Documentation that supports the payment of these services, such as receipts, invoices, and billing statements must be kept in the participant's program file or uploaded to the participant's file in the system of record.

## 402 Types of Supportive Services

A list of common items used to provide supportive services, as described in [20 CFR § 680.900](#) for adults and dislocated workers, and in [20 CFR § 681.570](#) for youth, is listed below. LWDBs are not limited to the items on this list, provided that the item is an allowable cost pursuant to federal regulations, and State and LWDB policies. Unless there are specific State requirements as described in this policy, LWDBs policies may adopt limitations for each item, including a maximum funding limit and a maximum length of time. Procedures may also be established to allow LWDBs to grant exceptions to those limits. LWDB policies must meet the requirements for necessary and reasonable expenditures as described in Section 401 of this policy:

- A. Linkages to community services;
- B. Transportation assistance;
- C. Child care and dependent care assistance;
- D. Housing and utility bills assistance;
- E. Lodging;
- F. Needs-related payments;
- G. Educational testing assistance;
- H. Reasonable accommodations for individuals with disabilities;
- I. Referrals to healthcare;

- J. Work-related expenses including uniforms, appropriate work attire, and work-related tools, including eyeglasses and protective eye gear;
- K. Training-related assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes, such as electronic devices;
- L. Payments and fees for employment and training-related applications, tests, and certifications;
- M. Reimbursement for cellular or internet service needed to create or maintain a wireless connection for distance learning, searching for employment, and job retention, consistent with local policies which include limits on costs and length of such services;
- N. Software as needed for career services, training related activities or job placement;
- O. Food at a reasonable cost to assist or enable participants to participate in allowable program activities and to reach the participants' employment and training goals, based on LWDB written policies and procedures for purchasing and distributing food, to ensure consistent treatment of these types of expenses; and
- P. Purchase of documentation needed for participants to meet work eligibility requirements.

#### 403 Child Care

Child care payments using WIOA Title I-B funds must be aligned with current State Child Care Allowances.

- A. Payment and eligibility for child care services will follow the guidelines set forth by the ADES Division of Child Care. Income eligibility and maximum reimbursement rates can be found in the ADES [Document Center](#), form number CCA-1227A.
- B. The child care provider must be an approved ADES contractor. A list of child care providers that contract with ADES is available from the [Child Care Resources & Referral Service](#).

#### 404 Lodging

A participant may receive lodging as a supportive service when attending a short-term training (one month or less) or when traveling to take a training-related examination when the training location/testing site is more than 50 miles from the participant's place of residence.

- A. The nightly rate must be less than the limitation set by the U.S. [General Services Administration](#) for the nightly lodging rate by City and State.
- B. The cost of nightly lodging rate must be reasonable, and comparable to other nightly lodging rates within comparable, reasonable distance from the training location or testing site.
- C. Depending on the length of the training, alternative accommodations must be considered, including lodging options that offer weekly rates or more permanent housing solutions, such as housing options that are rented on a month-to-month basis.

#### 405 Training-Related Expenses

A participant may receive training-related assistance as a type of supportive service.

- A. Electronic devices, such as computers, laptops, and tablets may be purchased for training participants if needed to successfully complete the program, or if needed for job placement while still receiving career and training services, when not available through other resources, and if permitted by the LWDB's Supportive Services policy.
  - 1. When the LWDB provides electronic devices as a supportive service, the LWDB's Supportive Service policy must include:
    - a. Cost limits for the electronic device which are consistent with market prices for comparable goods.
    - b. The disposition of the electronic device upon completion of the training, specifying whether the participant **is allowed** to retain the electronic device; and

- c. Procedures to determine whether the individual already owns or has access to the required electronic device prior to purchasing a new electronic device.
- 2. The participant's case notes must indicate that the electronic device is necessary for the participant to successfully participate in the training program.
- 3. The LWDB must adhere to the following requirements:
  - a. Follow their procurement standards for the purchase of any electronic device under this provision.
  - b. Devices may be purchased in bulk, with written justification to document how the purchase in bulk is more cost efficient.
  - c. Maintain an inventory to track each device provided to a participant.
  - d. The maximum cost of each device must not exceed the average fair market price for the device. Guidance on how to determine the average fair market price is found at [2 CFR § 200.404\(c\)](#).
  - e. Pre-approval from ADES [Fiscal Unit](#) is required for all capital equipment, including software (all components that make the item functional), **when the single-unit cost exceeds \$5,000, or when the total-purchase price exceeds \$10,000.**
  - f. The LWDB must establish and maintain security standards for any equipment for which the LWDB or fiscal agent retains ownership. LWDBs must also follow their established policies and procedures to ensure sensitive or personally identifiable information is not retained on equipment.
- B. Licenses, certifications, and testing fees may be paid when the license, certification, or the successful completion of the test:
  - 1. Is required to legally work in the occupation;
  - 2. Is required by a specific employer for the individual to obtain employment; or

3. Will result in an industry-recognized credential.

## **406 Needs-Related Payments**

Needs-related payments, as described in [20 CFR § 680.930-970](#), provide payments to adults, dislocated workers, and youth for the purpose of enabling individuals to participate in training activities. Unlike other supportive services, to qualify for needs-related payments a participant must be enrolled in training. However, payments may be provided if the participant has been accepted in a training program that will begin within 30 calendar days.

LWDBs may approve the use of needs-related payments, and must ensure that needs related payments are made consistent with [20 CFR § 680.930-970](#).

### **.01 WIOA Title I-B Adult Program Participants**

In order to receive needs-related payments, as described in [20 CFR § 680.940](#), participants in the WIOA Title I-B Adult program must:

- A. Be unemployed;
- B. Not qualify for, or have ceased qualifying for, unemployment insurance compensation; and
- C. Be enrolled in training services.

### **.02 WIOA Title I-B Dislocated Worker Program Participants**

In order to receive needs-related payments, as described in [20 CFR § 680.950](#), participants in the WIOA Title I-B Dislocated Worker Program must:

- A. Be unemployed, and:
  1. Have ceased to qualify for unemployment insurance compensation, or Trade Readjustment Allowance (TRA) under Trade Adjustment Assistance (TAA); and
  2. Be enrolled in a training service by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed six months; or

- B. Be unemployed and not qualify for unemployment insurance compensation, or TRA under TAA and be enrolled in training services.

### **.03 WIOA Title I-B Youth Program Participants**

Youth must be enrolled in the WIOA Title I-B Youth Program. Youth concurrently enrolled in the WIOA Title I-B Adult Program and the WIOA Title I-B Youth Program must be eligible under criteria applicable to the respective program and the services received.

### **.04 LWDB Needs-Related Payments Local Policy Requirements**

- A. LWDBs policies must establish the levels of needs-related payments for eligible adults, dislocated workers, and youth.
- B. For eligible dislocated workers, established levels of needs-related payments must not exceed the greater of either the following levels:
  - 1. For participants who were eligible for unemployment compensation as a result of a qualifying dislocation, the payment may not exceed the applicable weekly level of the unemployment insurance compensation benefit;
  - 2. For participants who did not qualify for unemployment insurance compensation **due to** a qualifying layoff, the weekly payment may not exceed the Federal poverty level for an equivalent period. The weekly payment level must be adjusted to reflect changes in total family income as determined by the LWDB; or
  - 3. For State-funded projects, the payment level for needs-related payments must be established by the Workforce Arizona Council.

### **407 Supportive Service Prohibitions**

Per [2 CFR § 200](#), unallowable costs which do not meet the conditions of supportive services include, but are not limited to:

- A. Payment toward goods, or services incurred or received prior to the participant's enrollment in a WIOA Title I-B program;
- B. Fines and penalties, such as for parking tickets, moving violations, and fines for late utility payments;



- C. Taxes, except for sales taxes and gasoline taxes, such as income taxes, and business/payroll taxes (for employers);
- D. Child support;
- E. Legal fees, such as bail and restitution;
- F. Debts that have been turned over to a collection agency;
- G. The purchase of goods or services that are illegal under any federal, State, local, or municipal law or statute;
- H. The purchase of cigarettes, alcoholic beverages, or firearms;
- I. Union dues; and
- J. Other career services and training services.

#### **408 Follow-Up Services**

- A. The WIOA Title I-B Youth Program allows the provision of supportive services as a follow-up service to ensure the youth is successful in employment and/or post-secondary and training. More information on youth follow-up services is found in the WIOA Title I-B Youth Program Policy from the ADES [Title I-B Policy and Procedure Manual](#).
- B. The WIOA Title I-B Adult and Dislocated Worker Programs do not allow the provision of supportive services after the completion of participation as supportive services are provided to enable adults and dislocated workers to participate in career and training services. (More information on Adult and Dislocated Worker Follow-up Services is found in the WIOA Title I-B Adult & Dislocated Worker Program Policy from the ADES [Title I-B Policy and Procedure Manual](#)).